

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**TERRELL MANUEL, *on
behalf of himself and all similarly
situated individuals***

Plaintiffs,

v.

Civil Action No. 3:14CV238

WELLS FARGO BANK, N.A.,

Defendant.

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, APPLICATION FOR SERVICE AWARD TO THE CLASS
REPRESENTATIVE, AND APPLICATION FOR AWARD OF ATTORNEYS' FEES**

Plaintiff, Terrell Manuel, on behalf of himself and the Class, respectfully moves for final approval of the class settlement reached in this case and applies for a service award for his role in prosecuting this action. Class counsel also apply for an award of attorneys' fees and for the reimbursement of their out-of-pocket expenses incurred in furtherance of litigating this matter to the successful result now before this Court for final approval. For the reasons explained in the accompanying memorandum in support of this motion, the Plaintiff respectfully requests entry of an order of Final Approval filed herewith.

Respectfully submitted,

TERRELL MANUEL
*on behalf of himself and
all others similarly situated,*

By _____/s/_____

Leonard A. Bennett, VSB 37523 Susan M. Rotkis, VSB 40693 Consumer Litigation Associates, P.C.	Christopher Colt North William Leonard Downing THE CONSUMER & EMPLOYEE RIGHTS LAW
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CERTIFICATE OF SERVICE

I hereby certify that on 4th day of March, 2016, I filed a true and correct copy of the foregoing on the Court's CM/ECF System, which will send a notice of electronic filing to all counsel of record, including:

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/s/
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